

December 4, 2020

Fanny Pan
Deputy Executive Officer
Los Angeles County Metropolitan Transportation Authority
One Gateway Plaza
Los Angeles, CA 90012-7952

RE: Modernizing the Metro Highway Program

Dear Ms. Pan,

Thank you for the opportunity to comment on the proposed updates to the Measure R and Measure M highway guidelines. The Westside Cities Council of Governments (WSCCOG) strongly supports the proposed guidelines, which are consistent with our subregion's emphasis on multimodal transportation and accessibility. As demonstrated by our proposed funding allocations for Measure M and our recently adopted Westside Mobility Study, the WSCCOG has consistently sought to improve transit and active transportation. We welcome a Metro Highway Program that further empowers our cities to achieve these improvements.

The proposed guidelines are consistent with Metro's stated goals of sustainability and racial justice. In Metro's September 2020 *Moving Beyond Sustainability* plan, Board Chair Eric Garcetti notes that "passenger vehicles are the region's single greatest source of greenhouse gas emissions." Metro's June 2020 statement on Black Lives Matter acknowledges that "freeways were built through minority communities while more affluent, whiter communities were spared." By allowing our subregion flexibility to spend highway funds on bus, bicycle, and pedestrian infrastructure, Metro's revised guidelines would accelerate LA County's shift away from automobile-oriented infrastructure of the past.

Furthermore, the proposed guidelines align with state and regional transportation goals. To discourage automobile-oriented planning, California's Senate Bill 743 initiated a shift from level of service (LOS) to vehicle miles traveled (VMT) as the metric for analyzing transportation impacts under the California Environmental Quality Act. SCAG's 2020 Regional Transportation Plan/Sustainable Communities Strategy (RTP/SCS) aims to reduce VMT per capita 5 percent to meet its regional greenhouse gas reduction targets. Metro's modernized highway guidelines would allow the WSCCOG subregion to contribute to these ambitious goals.



We appreciate the opportunity to comment on the Metro Highway Program, and we will continue working with Metro to achieve its equity and sustainability goals. Questions regarding this letter may be directed to WSCCOG Project Director Winnie Fong at winnie@estolanoadvisors.com or (323) 306-9856.

Very truly yours.

Cecilia V. Estolano Executive Director

Westside Cities Council of Governments

CC: Honorable Board Members of Westside Cities Council of Governments

CC: James de la Loza, Chief Planning Officer

CC: Richard Clarke, Chief Program Management Officer